

REMARKS

This is in response to the Office Action mailed August 4, 2006. As an initial matter, Applicant appreciates the thorough examination by the Examiner.

Amendments

Applicant is amending Claims 1, 15, and 25.

As suggested by the Examiner, Applicant is amending independent Claim 1 to recite that a single motor is connected to “more than” one of the drive assemblies connected to the respective pumps. Applicant submits that the specification as filed supports this amendment (see Specification, paragraphs 56-58).

Applicant is further amending independent Claims 1 and 15 and dependant claim 25 to recite that the motor engages all of the connected drive assemblies, and therefore all of the respective pumps, “at the same time.” Application submits that the specification as filed supports these amendments (see Specification, paragraph 58).

The Examiner’s Interpretation of Claim 1

The Examiner alleges that the use of the alternative phrase “at least one” as a modifier of “motors” and “drive assemblies” in independent Claim 1 fails to positively and distinctly claim that a motor engages other drive assemblies other than that of the “[at least] one drive assembly.”

Applicant submits that independent Claim 1 as amended per the Examiner’s suggestion clearly recites that a motor engages more than one drive assembly.

The Examiner's Rejections

The Examiner rejects Claims 1 and 10 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,234,007 to Titone *et al.*

The Examiner also rejects Claims 1-2, 4-7, 9, and 12 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,980,836 to Moffett *et al.*

The Examiner further rejects Claims 3 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Moffett.

The Examiner also rejects Claims 10, 15-21, 25, and 28 under 35 U.S.C. § 103(a) as being unpatentable over Moffett in view of U.S. Patent No. 2,244,106 to Granberg *et al.*

Still further, the Examiner rejects Claims 13, 14, 26, 27, and 29-33 under 35 U.S.C. § 103(a) as being unpatentable over Moffett in view of U.S. Patent No. 3,957,203 to Bullard and U.S. Patent No. 3,074,649 to Atkinson.

In response to the Examiner's above-referenced rejections, Applicant submits amended claims and addresses the Examiner's concerns herein below.

The Amended Claims Are Not Anticipated by Titone

The Examiner rejects Claims 1 and 19 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,234,007 to Titone *et al.* The Examiner alleges that Titone discloses a liquid mixing device capable of mixing any desired liquid placed in solution tanks 14, 20; pump assemblies 18, 24; and a manifold 46 (see Titone, Figure 2). The Examiner further alleges that Titone discloses conduits and couplings to attach the conduits to the tanks, pumps, valves, and drains. Applicant respectfully disagrees with the Examiner's assessment of the manifold as disclosed by Titone for the reasons set forth below.

Application respectfully points out that the item labeled number 46 identified by the Examiner as the equivalent of a manifold is actually a controller involved in the

electrical monitoring and control of the disclosed system (see Titone, Column 2, Lines 62-64). The controller 46 is not in fluid communication with the solution tanks, pump assemblies, conduits, valves, or drains, and the controller does not serve to mix the separate components contained in the solution tanks. In fact, Titone fails to provide a means for mixing the supplied liquids prior to application of the liquids.

Further, Titone specifically states that "resin is applied to the mixture [of air and foaming agent] just prior to application" (Titone, Column 1, Line 11). The device disclosed by Titone is designed for use with an applicator system in which a layer of resin from a first tank simply covers the foaming agent supplied from the second tank (see Titone, Column 2, Line 51). Titone neither requires nor even suggests the mixing of the liquids. As a result, the device disclosed by Titone does not contain a manifold as disclosed in the present application or an equivalent. Therefore Titone fails to disclose each and every element of the present invention and must be removed as a 35 U.S.C. §102(b) reference.

The Amended Claims Are Not Anticipated by Moffett

The Examiner has rejected Claims 1-2, 4-7, 9, and 12 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5980836 to Moffett. The Examiner alleges that Moffett discloses a liquid mixing device capable of mixing any desired liquid having solution tanks 10, 12, 14, 16; pump assemblies 68, 36, 44, 24, 102, 84; a manifold 20, 52, 76, 78, 20, 20A, 78, 78A, 76, 76A, 78, and 106; and a drain assembly. The Examiner further alleges that Moffett discloses conduits and couplings to attach the conduits to the tanks, pumps, valves, and drains. Still further, the Examiner argues that the tank 16 may be heated. Applicant respectfully disagrees with the Examiner's assessment of the pump assemblies, namely the motors and drive assemblies, as disclosed by Moffett for the reasons set forth below.

Moffett discloses an apparatus for preparing low concentration polysilicate microgels that includes a number of reservoirs 10, 12, 14; a number of pump assemblies 68, 36, 44, 24, 102, 84; and a number of manifolds 20, 52, 76, 78 (see Moffett, Figure 1), 20, 20A, 78, 78A, 76, 76A (see Moffett, Figure 2), 78, 106, 20 (see Moffett, Figure 3). As disclosed, the pumps of Moffett—and the respective drive assemblies of each pump—are spaced apart from one another. Further, the drive assemblies of each pump are not connected to one another. Accordingly, Applicant submits that a motor of one of the Moffett pumps is incapable of driving the drive assembly to which it is connected (i.e., “connected drive assembly”) and the drive assemblies of the other pumps (i.e., “any other connected drive assembly”). In other words, none of the pumps disclosed by Moffett include a motor that is capable of engaging its own respective drive assembly as well as the drive assemblies of other pumps. Accordingly, the pumps of Moffett are incapable of operating in conjunction with one another.

In contrast, as set forth in Claims 1, 15, and 25, the present invention provides a plurality of pumps 22, 23, 24—each having a drive assembly 26—in communication with a plurality of tanks 15, 16, 17, 18, and at least one motor 25 connected to more than one drive assembly, wherein the motor engages the drive assembly of one pump to operate the multiple drive assemblies of the pumps to which the motor is connected (see Figures 1-3 and 5). Specifically, the couplings 27 connect the drive assemblies of each pump to permit such engagement (see Figures 1, 3, and 5). Independent claim 15 explicitly claims the coupling of the pumps, and independent claim 1 as amended clearly identifies the arrangement in which one motor drives multiple pumps.

Accordingly, Moffett does not teach or suggest a pump assembly having a motor that is capable of driving more than one drive assembly. To the contrary, Moffett teaches away from a pump assembly capable of operating in conjunction with drive assemblies of other pumps by remotely positioning pumps (and respective drive assemblies) apart from one another. By doing so, Moffett limits the pumps to independent operation, in contrast

to the present invention, which facilitates the operation of pumps in a cooperative mode. Thus, Moffett does not disclose all of the elements described in independent Claims 1 and 15 and therefore must be removed as a §102(b) reference.

The Claims are not Obvious in View of Prior Art

The Examiner rejects Claims 3, 10, 11, 13-21, and 25-33 under 35 U.S.C. §103(a) as being unpatentable over Moffett in view of—either alone or in combination with—U.S. Patent No. 2,244,106 to Granberg *et al.*, U.S. Patent No. 3,957,203 to Bullard, and U.S. Patent No. 3,074,649 to Atkinson.

Moffett

With respect to Claims 3 and 11, the Examiner alleges that Moffett discloses all of the recited subject matter except for couplings capable of receiving a hose and a diaphragm pump. Applicant submits that Moffett fails to disclose pumps having drive assemblies, and a motor connected to more than one drive assembly, wherein the motor engages the respective drive assembly (i.e., “connected drive assembly”) and drive assemblies of the other pumps (i.e., “any other connected drive assemblies”).

As set forth above, Moffett teaches pump assemblies that operate independently from one another and arranged adjacent to the respective reservoirs. As configured, the pumps—and respective drive assemblies associated with each pump—operate independently. Being restricted to independent operation, Moffett fails to teach (1) a plurality of pumps each having a drive assembly, and (2) a motor, wherein the motor is connected to more than one drive assembly such that the motor drives any drive assembly to which the motor is connected (i.e., drive assemblies that are capable of operating in conjunction with one another) (see Figures 1-3 and 5).

The present invention provides a plurality of tanks, a pump assembly having one or more pumps (each having a drive assembly), and a motor connected to more than one

drive assembly such that the motor engages the connected drive assembly and any other connected drive assemblies.

Accordingly, Moffett fails to disclose an apparatus having pumps that are aligned such that a motor of one pump drives the drive assemblies of other pumps and therefore must be removed as a §103(a) reference.

Moffet and Granberg

With respect to Claims 10, 15-21, 25, and 28, the Examiner argues that Moffet discloses all of the recited subject matter with the exception of one motor which is connected to one of the drive assemblies such that the motor engages one drive assembly to drive each of the drive assemblies. The Examiner alleges that Granberg teaches a pump control system that may utilize a single motor 10 connected to co-axially aligned drive assemblies 28, 29, 30 upon the shaft between 11 and 12 which drive respective pumps 6, 7, 8, so as to provide proportional pumping of liquid ingredients. More accurately, Granberg discloses a pump control system having a motor 10 connected to a series of pulleys 12, 13, and 14 connected to pulleys 15, 16, and 17 configured to drive pumps 6, 7, and 8, respectively (see Granberg, Figure 1). As configured, however, the pulleys, or drive assemblies, of Granberg are designed to be engaged in a mutually exclusive manner. In other words, Granberg specifically discloses that the device is intended to be configured such that “[i]t is impossible, therefore, for the loading operator to switch two pumps onto the motor at the same time” (see Granberg, Column 3, Line 2).

In contrast, amended Claims 10, 15, and 25 recite that the motor of the present application is intended to operate each of drive assemblies simultaneously. Accordingly, Moffet taken either individually or in combination with Granberg, does not teach or suggest a single motor connected to multiple drive assemblies, wherein the motor provides driving power to each of the drive assemblies at the same time.

Moffett, Bullard, and Atkinson

With respect to Claims 13-14, 26-27, and 29-33, the Examiner argues that Moffett discloses all of the recited subject matter as defined within the scope of the claims with the exception of the system being mounted on a vehicle or mobile platform. According to the Examiner, Bullard allegedly teaches that a mixed fluid material supplied in a tank may be provided upon a mobile platform 12. Atkinson supposedly teaches that a fluid delivery system from a tank 9, boom 3, and nozzle 1 may be operated from a cab 53. In sum, the Examiner argues that it would have been obvious to one of ordinary skill in the art to provide the mixing device of Moffett with a mount upon a vehicle or mobile platform with a cab, boom, or basket and nozzle for the mixer tank device of Moffett so that the mixed fluid may be easily transported and delivered to a particular location. Applicant respectfully disagrees with the Examiner's assessment of the pump assembly as disclosed by Moffett, and the alleged mobile platform as disclosed by Bullard.

As noted above, Moffett fails to disclose an apparatus having pumps that are aligned such that a motor of one pump drives the drive assemblies of other pumps. Neither Bullard nor Atkinson disclose this feature of the present invention, and thus Moffett, taken either individually or in combination with Bullard and/or Atkinson, still fails to teach or suggest the components of the claimed invention.

Further, Applicant continues to submit that the platform of Bullard is a truck bed forming an integral part of the vehicle frame (see Bullard, Column 2, Lines 32-33). In contrast, the present invention includes a wheeled platform 54 releasably secured to, and not integral with, the vehicle frame. As constructed, Bullard fails to teach the use of a platform secured to, yet distinct from, a vehicle (see Figures 7 and 8).

For the reasons stated above, Moffett fails to stand as proper prior art, and taken either individually or in combination with Bullard and Atkinson, does not teach or suggest a mobile decontamination module comprising (1) tanks, a first pump having a drive assembly, a second pump having a drive assembly, a coupling connecting the drive

assemblies of the first and second pumps, and a motor connected to the drive assembly of the first pump, such that the motor engages the drive assemblies of the first and second pumps or (2) a wheeled platform that supports tanks, pumps, drive assemblies, and a manifold, wherein the platform is a separate and distinct component apart from the vehicle (i.e., not integral with the vehicle).

In view of the structural distinctions between the present invention and the cited references, Applicant submits that combining Moffett—either alone or in combination with—Bullard and Atkinson in a way that renders the present invention obvious relies on impermissible hindsight.

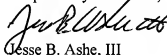
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CONCLUSION

Based on foregoing amendments and arguments, Applicant submits that pending Claims 1-7, 9-21, and 25-33 are now in immediate condition for allowance, and the same is respectfully requested. Applicant is paying for a one-month extension by Deposit Account No. 50-0332. Presently, there are 29 pending claims in this application; thus, Applicant believes that there are no additional fees due associated with this amendment. Nevertheless, the Commissioner is authorized to charge any additional fee, or credit any refund, to Deposit Account No. 50-0332.

Respectfully submitted,



Jesse B. Ashe, III
Registration No. 44,513

Enclosures
021176
Summa, Allan & Additon, P.A.
11610 North Community House Road
Suite 200
Charlotte, NC 28277-2162
Telephone: 704-945-6703
Facsimile: 704-945-6735
File No.: 1225.14